



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date	April 16, 2001	EPA Reg No./File Symbol	72977-R	Page 1 of 3	
Applicant's/Registrant's Name & Address		Product			
ETI H2O, Route 14, Box 1517, Lake City, FL 32054		Axenohl			
Ingredient Citric Acid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 830	Group B - Physical/Chemical Properties	N/A	Reregistration Eligibility Document	PL	1
OPPTS 870.1100	Acute Oral Toxicity	N/A	"	"	1
OPPTS 870.1200	Acute Dermal Toxicity	N/A	"	"	1
OPPTS 870.1300	Acute Inhalation Toxicity	N/A	"	"	1
OPPTS 870.2400	Acute Eye Irritation	N/A	"	"	1
OPPTS 870.2500	Acute Dermal Irritation	N/A	"	"	1
OPPTS 870.2600	Skin Sensitization Test	N/A	"	"	1
OPPTS 850.2100	Avian Acute Oral Toxicity Test	N/A	"	"	1
OPPTS 850.2200	Avian Dietary Toxicity Test	N/A	"	"	1
OPPTS 850.1075	Fish Acute Toxicity Test, freshwater and marine	N/A	"	"	1
OPPTS 850.1010	Aquatic Invertebrate Acute Toxicity Test, Daphnia	N/A	"	"	1
Signature		Name and Title		Date	
		Henry Jacoby, Agent		5/2/01	

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1. Reregistration Eligibility Document - Citric Acid, Prevention, Pesticides And Toxic Substances, EPA-738-F-92-017, June 1992, Page 5.

"In considering citric acid for reregistration eligibility, the Agency believes it is an active ingredient that should be considered for this broad waiver of the generic data requirements. The considerations that lead the Agency to this conclusion are as follows:

The U. S. FDA lists citric acid as a multiple purpose "generally recognized as safe" (GRAS) food substance (21 CFR part 182). Citric acid is also approved by the Joint FAO/WHO Expert Committee on Food Additives for use in foods without limitation.

There is no indication in the available information on citric acid as provided by the registrant that suggests that citric acid would constitute a hazard to the public or to the environment. Citric acid is widely distributed in plants and animals and occurs naturally in foods in substantial quantities. It is a well-known intermediate in carbohydrate metabolism and ingested citrate is considered to be completely metabolized.

Citric acid from living organisms is found naturally in soil and water. Citrates leached from rotting vegetation and produced by microorganisms have been detected at low levels through the ecosystem. Citric acid degrades readily when in contact with a variety of microorganisms that are found in soil, natural waters or sewage treatment systems. There is negligible human and environmental exposure to citric acid as a pesticide as a result of current registered use patterns, e.g., it has a low use rate and frequency of application.

No reports or adverse effects have been submitted to the Agency for this active ingredient. Citric acid, is, however, a severe eye irritant and moderate skin irritant, so appropriate label precautions are necessary. There is no indication of any other significant adverse effects from citric acid to humans or the environment associated with its use as a pesticide.

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Based on these factors the Agency does not believe generic data beyond those data required to satisfy basic product identity and chemistry questions ... are necessary to determine if the current registered uses of this active ingredient pose unreasonable risks to humans or the environment. Therefore, the Agency waived all generic data requirements except the basic product identity and chemistry data. The Agency believes that, based on the above factors, the registered uses of citric acid do not pose unreasonable risks to humans or the environment."

The present application does not result in an use that is substantially different from those already registered. Therefore the Agency's rationale and waiver is applicable. No additional data are required.